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10 *Attorneys for Defendant*
11 *NETFLIX, INC.*

12 **UNITED STATES DISTRICT COURT**
13
14 **NORTHERN DISTRICT OF CALIFORNIA**
15
16 **OAKLAND DIVISION**

17 LAURI VALJAKKA,

18 *Plaintiff,*

19 v.

20 NETFLIX, INC.,

21 *Defendant.*

Case No.: 4:22-cv-01490-JST

22 **DECLARATION OF RACHAEL D.**
23 **LAMKIN IN SUPPORT OF DEFENDANT**
24 **NETFLIX, INC.'S REPLY IN SUPPORT**
25 **OF ITS MOTION FOR SUMMARY**
26 **JUDGMENT**

27 Judge: Hon. Jon S. Tigar
28

1 I, Rachael D. Lamkin, hereby declare:

2 1. I am a partner with the law firm Baker Botts L.L.P. (“Baker Botts”), and counsel of
3 record for Defendant Netflix, Inc. (“Netflix”) in the above-captioned matter.

4 2. I am admitted to practice in all state and federal courts in California, federal courts
5 in Colorado, the Eastern and Western Districts of Texas, the Eastern District of Michigan, and the
6 Third Circuit Court of Appeal. I am also admitted in the Federal Circuit, the International Trade
7 Commission, the Court of International Trade, and this Honorable Court.

8 3. I have personal knowledge of the facts stated herein.

9 4. Attached as Exhibit 1 is a true and correct copy of a redline comparison prepared by
10 counsel for Netflix, using Microsoft Word, between Valjakka’s opposition to Netflix’s motion for
11 a preliminary injunction (ECF No. 143) under the CUVTA and his opposition brief moving for no
12 summary judgment on Netflix’s CUVTA claim (ECF No. 335). The substance of the briefs has
13 been reproduced word-for-word and compared for the Court’s ease of reference; no statements
14 therein have been altered or modified.

15 5. Valjakka cites a purported Finnish Supreme Court decision to claim he held a good-
16 faith belief in his ownership of the ’167 Patent. The document is in English even though the Finnish
17 courts do not issue opinions in English. The Finnish Supreme Court does issue summaries in
18 English but have not issued any for 2025. See <https://korkeinoikeus.fi/en/index/lausunnot.html>.

19 6. There are other issues with the alleged Supreme Court opinion, including:

- 20 • It is in English and styled “DECISION Page 1 (of 6)”—but the filed exhibit contains only
21 four pages.
- 22 • It claims Case Number: “H 1/2024/287,” Date of Issuance: “August 26, 2025,” Decision
23 Number: “1025 2792.” There is no Finnish (or Swedish) original, no ECLI or standard KKO
24 (“Supreme Court of Finland”) citation, no official certification, no signature/attestation
25 page, and no translator declaration.

- The Supreme Court of Finland (Korkein oikeus, “KKO”) publishes its decisions in Finnish or Swedish and, when it chooses, posts *short English summaries* of selected precedents—English texts are not the official decisions.
- Official decisions carry a “KKO:YYYY:NN” (or “KKO NNN/20YY” for non-precedents) and frequently an ECLI identifier; the English page is explicitly a summaries section. There appear to be no summaries from 2025.
- See: <https://korkeinoikeus.fi/en/index/ennakkopaatokset.html>.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct to the best of my knowledge.

Executed on 11th day of September 2025 in San Francisco, California.

/s/ Rachael D. Lamkin

Rachael D. Lamkin